IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

EBONI LYLES PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-CV-154-TSL-RHW

QCHC Inc. d/b/a Quality Correctional Health Care and KIMYUANA JACKSON

**DEFENDANTS** 

JOINT MOTION TO APPROVE SETTLEMENT

At a settlement conference held with Magistrate Judge Robert H. Walker on June 14,

2016, Defendants QCHC, Inc., and Kimyuana Jackson, and Plaintiff Eboni Lyles, reached a

negotiated settlement of the Plaintiff's claims for unpaid overtime and retaliatory discharge

under the Fair Labor Standards Act ("FLSA"). Defendants deny liability, but due to the

uncertainty of litigation, agreed to a compromise resolution. Likewise, the Plaintiff agreed to

accept a compromise settlement of her claims. Accordingly, the Parties hereby jointly move the

Court to approve their Confidential Settlement Agreement, which is submitted for en camera

review simultaneous with the filing of this motion.

DATED: July 29, 2016

July 27, 2010

Respectfully submitted,

/s/ Joel Dillard

FOR PLAINTIFF EBONI LYLES

Joel Dillard, Esq. Joel Dillard, P.A. 405 Tombigbee Street Jackson, MS 39201

## /s/ Lewis W. Bell

FOR DEFENDANTS QCHC, INC and KIMYUANA JACKSON

Justin A. Barkley (Admitted *Pro Hac Vice*) Alabama Bar No.: ASB-3855-S76B General Counsel QCHC, Inc. Quality Correctional Health Care 200 Narrows Parkway, Suite A Birmingham, AL 35209

Lewis W. Bell (MSB No. 2337) Walter J. Brand (MSB No. 4313) WATKINS & EAGER PLLC Post Office Box 650 Jackson, Mississippi 39205 (601) 965-1900 lbell@watkinseager.com wbrand@watkinseager.com